



ENVIRONMENTAL DEFENSE

finding the ways that work

July 22, 2005

Mr. Paul Dabbs
Statewide Planning Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

RE: California Water Plan Update 2005, Public Review Draft, April 2005

Dear Mr. Dabbs:

Environmental Defense commends the Department of Water Resources for its most recent draft Water Plan Update (April 2005). Environmental Defense was a member of both the 1998 and 1993 Advisory Committees, so we can write with certainty that this Plan is the most thorough to date and that it applies a more comprehensive set of tools for resolving water resource issues than previous Plans. Using these tools, including but not limited to cost-effective conservation, reclamation, and conjunctive use, the Plan shows that if managed properly, California can use less water in the future than it does today and still support a dynamic agricultural economy and a growing population. The Plan's emphasis on alternatives to new surface storage and conveyance reflects what many water agencies have been doing for more than a decade. While there are many improvements in this Plan, we offer the following suggestions to improve the quality of what will surely be an important planning tool for water managers statewide.

For the first time, the Plan recognizes that many environmental flow objectives, recommended and pursued by state and federal agencies after scientific investigation, have not been met. The quantification of a very limited set of these unmet objectives is an important first step. DWR should expand this list to include and quantify a comprehensive list of unmet environmental objectives, extending from the Klamath River in the north to the Salton Sea in the south.

Given DWR's role in protecting, restoring, and enhancing the State's natural resources, the Plan should strongly recommend that *all* environmental flow objectives be met. DWR should have a direct interest in restoring the State's ecosystems, since doing so will have a positive effect on the management and quality of our water resources. We strongly propose that recommendations be added or at least strengthened (in the

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Highlights document, as well as Chapters 1 and 5) to emphasize the importance of enforcing and implementing environmental flow objectives for ecosystem restoration.

In addition to the degree to which ecosystem restoration is addressed in the Plan, we have concerns about the overall message the Highlights document is attempting to convey. On the one hand, the document heavily focuses on conservation, reclamation, and conjunctive use as the most promising strategies to address future water supply. These efficiency actions are cost effective, environmentally favorable, practical, and politically favorable. It is confusing, then, that one of the two "Initiatives" to ensure reliability focuses on implementing the CALFED program, which includes plans to build new and raise existing destructive dam projects and expand conveyance systems. This emphasis on infrastructure is in stark contrast to the data presented in the Plan and also fails to recognize the fiscal and environmental realities that will likely prevent these projects from ever moving forward.

The Plan needs to clearly send the message that California has indeed developed significant water storage – indeed, more than 6 million acre-feet in the past 15 years -- and that there are feasible ways to more efficiently and effectively use existing supplies. At a time when the Bay-Delta ecosystem is on the brink of collapse, largely due to fresh water diversions from the Delta, DWR should help promote strategies that will reduce stresses on this critical resource.

We appreciate the opportunity to comment on the Draft Plan and hope that DWR staff thoughtfully considers our comments and suggestions in the revision process. We look forward to the final Plan when it is released in the fall.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Hayden", with a long horizontal flourish extending to the right.

Ann Hayden

Water Resource Analyst